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February 25, 2000

Mr. Vernon A. Williams, Secretary
Surface Transportation Board
Office of the Secretary
Case Control Unit
Attn: STB Ex Parte No 582
1925 K Street NW
Washington, DC 20423-0001



Mr. Williams:

Great Northern Grain Terminals Ltd. is a grain company that is a major user of all rail service in the U.S. and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus whether the proposed CN-BNSF combination should be judged on its merits and if other propose mergers, then these cases ought to be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service, not because of timing. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination, and any other future mergers, will deliver service.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process. Do not let other railroads use the Service Transportation Board proce3ss to protect themselves and not shippers,

Regards,


Bruce Horner, CEO

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